

EXHIBIT A
ATTORNEY FEES

<u>Date</u>	<u>Attorney</u>		<u>Hours</u>
9/20/04	Abraham	Review of Complaint; phone conf. w/Kuhar	1.00
9/21/04	Abraham	Phone conf's. w/Kuhar; phone conf. w/D Brace, re: Status; Review correspondence	1.00
9/22/04	Abraham	Phone conf. w/Kuhar & Nichols re: More Specific Pleading	1.00
9/26/04	Jones	Review of Documents	.20
9/27/04	Abraham	Phone conf. w/Jones	.25
9/27/04	Jones	Phone conf. w/Abraham; Research & prepare response	2.90
9/28/04	Jones	Legal Research; Prepare response	1.30
9/28/04	Abraham	Phone conf. w/Jones, re: Complaint	.25
9/29/04	Jones	Prepare response	.10
10/1/04	Kenney	Review of Complaint & Rules of Civil Proc; Phone conf. w/Jones; Review Motion;	1.25
10/1/04	Jones	Legal research; Prepare response	.60
10/4/04	Kenney	Phone conf w/Jones; Review Civil Procedures; Email, re: Civil Procedures; Discussion of comp.	1.00
10/4/04	Jones	Legal research; Prepare response	.30
10/5/04	Jones	Legal research; Prepare response	.70
10/11/04	Jones	Legal research; Prepare response	1.20
10/11/04	Kenney	Phone conf's. w/Jones, re: Complaint; Review of Amended Complaint	.75
10/12/04	Kenney	Legal research, re: 12(b)(6) Motions & past cases	.75
10/12/04	Jones	Legal research; Prepare response	.10

10/13/04	Kenney	Legal research, re: Fed. Rules; Draft memo to Jones; Phone conf. w/Jones	2.00
10/13/04	Jones	Legal research; Prepare response	.70
10/15/04	Jones	Legal research; Prepare response	.40
10/19/04	Jones	Legal research; Prepare response	.10
10/21/04	Jones	Legal research; Prepare response	.30
10/21/04	Kenney	Review of Waiver of Service Agreement	.25
10/26/04	Jones	Conference w/Opposing Counsel	3.00
11/18/04	Jones	Phone conf. w/Abraham; Draft response	.90
11/19/04	Jones	Prepare and send response; Draft motion; Draft letter to insurer	.80
11/22/04	Widoff	Review of Correspondence	.60
11/22/04	Abraham	Review of Correspondence	.25
12/1/04	Kenney	Legal research, re: Discrimination Claim/DFR/PHRC/ EEOC/Federal Claims	5.25
12/2/04	Kenney	Legal research; Draft 12b6 Motion	6.25
12/3/04	Kenney	Legal research; Draft 12b6 Motion	1.00
12/5/04	Kenney	Legal research; Draft 12b6 Motion	2.00
12/6/04	Kenney	Legal research; Revisions to 12b6 Motion	4.00
12/6/04	Kenney	Phone conf. w/Jones, re: Motion & Edits	.75
12/6/04	Jones	Prepare Motion	1.60
12/7/04	Kenney	Legal research; Review CBA/Complaint letter; Revise 12b6 Motion	2.75
12/7/04	Jones	Prepare Motion	.10
12/8/04	Widoff	Review Correspondence & Complaint	1.00

12/9/04	Kenney	Phone conf. w/Jones, re: 12b6 Motion	.25
12/9/04	Jones	Prepare Motion	.50
12/10/04	Jones	Prepare Motion	.10
12/13/04	Kenney	Legal Research; Draft affidavits; Edit 12b6 Motion	6.00
12/13/04	Jones	Prepare Motion	.20
12/14/04	Kenney	Review & edit 12b6 Motion, Affidavits; Phone conf's. w/Jones; Review District's Answer to Complaint	3.50
12/14/04	Jones	Prepare Motion	2.40
12/14/04	Abraham	Review 12b6 Motion	.50
12/15/04	Jones	Prepare Motion to Dismiss	.20
12/16/04	Kenney	Review documents	.25
1/3/05	Kenney	Review of Court Order/Motion to Dismiss; Email Brace; Prepare Brief in Support of Motion	4.00
1/3/05	Abraham	Review Motion to Dismiss	.25
1/4/05	Kenney	Prepare 12b6 Brief	4.00
1/5/05	Kenney	Prepare 12b6 Brief; Legal research, re: discrimination & 1981 burden of proof	2.00
1/5/05	Kenney	Legal research, re: Discrimination & 1981 burden of proof	1.75
1/6/05	Kenney	Prepare Brief; legal research	2.00
1/7/05	Kenney	Prepare Brief	3.00
1/7/05	Jones	Prepare Brief	2.80
1/9/05	Kenney	Legal research, re: 12b6 Motion; Phone conf's. w/Jones; Emails to Jones	4.00
1/10/05	Jones	Prepare brief & file	3.70
1/12/05	Abraham	Review brief	.25

1/18/05	Abraham	Review Correspondence	.25
1/26/05	Jones	Prepare for oral argument	.20
2/1/05	Jones	Prepare for oral argument	.10
2/2/05	Kenney	Phone conf. w/Brace, re: Motion for Summary Judgment; Review Brief in Opposition to Motion	1.25
2/2/05	Jones	Prepare for oral argument	.20
2/3/05	Kenney	Phone conf. w/Brace, re: hearing schedule	.25
2/3/05	Abraham	Meet w/Kenney	2.00
2/3/05	Jones	Prepare for oral argument	.80
2/4/05	Jones	Prepare for oral argument	.20
2/7/05	Kenney	Prepare for Federal Court/ Phone conf. w/Jones; Review of brief	1.00
2/7/05	Kenney	Prepare for oral argument	.90
2/8/05	Kenney	Prepare for and conduct conf. call w/Judge/Jones/Nichols	1.25
2/8/05	Jones	Prepare for and conduct conf. call w/Judge/Kenney/Nichols	1.30
2/9/05	Jones	Prepare for oral argument	.30
2/10/05	Kenney	Legal research, re: Discrimination, 1981 and 1983 claims	.50
2/11/05	Kenney	Legal research, re: Discrimination and 1981 claim	4.00
2/11/05	Abraham	Review of Correspondence	.25
2/11/05	Jones	Legal Research, re: Rule 11	.20
2/14/05	Kenney	Phone conf. w/Jones, re: Rule 11 violations; phone conf. w/Mehok, re: Plaintiff's brief & hiring practices	1.00
2/14/05	Jones	Prepare for oral argument	.30
2/24/05	Kenney	Phone conf. w/Jones, Park; Review of Amended brief; Prepare for oral argument	6.00

2/24/05	Jones	Prepare for oral argument	.50
2/25/05	Kenney	Federal Court argument	7.00
2/28/05	Kenney	Phone conf. w/Jones, re: Motion	.50
2/28/05	Jones	Update on argument	.30
3/10/05	Kenney	Prepare Answer	4.00
3/10/05	Abraham	Phone conf. w/Kenney, re: status	.25
3/15/05	Kenney	Review Answer; Prep for filing; Phone conf. w/Hootman	1.50
3/16/05	Kenney	Prepare Answer for filing	.50
3/22/05	Kenney	Phone conf. w/Brace, re: Discovery	.25
3/23/05	Kenney	Review of Rules; Research	1.00
3/24/05	Kenney	Legal research, re: Federal Rules; Phone conf. w/Kuhar	.75
3/29/05	Kenney	Phone conf. w/Brace, Kuhar, re: Scheduling conf.	.75
3/30/05	Kenney	Phone conf. w/Kuhar, Nichols, re: 26f meeting	1.50
4/4/05	Kenney	Review of pleadings; Prepare for discovery	1.50
4/6/05	Kenney	Prepare discovery materials	.50
4/7/05	Kenney	Prepare letter to Lewis, Cartmel & Brace	1.50
4/8/05	Kenney	Prepare discovery materials	1.50
4/12/05	Kenney	Review of Rule 26f Report; Email to Kuhar; Review Document lists; Conf. w/Cartmel; CCEA Meeting	1.00
4/14/05	Kenney	Review CCEA Financial documents	1.50
4/18/05	Kenney	Phone conf. w/Brace, re: Discovery; Calls to Judge McLaughlin re: scheduling hearing	.50
4/19/05	Kenney	Phone conf. w/Kuhar	.25
4/19/05	Kenney	Review of discovery docs, Ins. Liability coverages, membership rosters	1.75

4/19/05	Kenney	Conf. w/CCEA Officers & UniServ Rep	5.25
4/20/05	Kenney	Phone conf. w/Kuhar/Nichols/Judge's Office, re: Scheduling Conference; Review of Local Rules & docs Provided by Association	2.50
4/21/05	Kenney	Phone conf. w/Judge's Chambers/Kuhar/Nichols, re: schedule changes	.50
4/27/05	Kenney	Prepare initial disclosures for discovery	4.00
5/9/05	Kenney	Review initial disclosures; Prepare for discovery conf.	.75
5/10/05	Kenney	Attend pre-discovery conf. w/Judge/Nichols/Kuhar; Draft Letter to ins. Carrier; Review charge; Investigation; Phone Conf. w/Kuhar	5.75
5/11/05	Kenney	Review of Scheduling Order	.25
5/12/05	Kenney	Review of District discovery docs, initial disclosures	1.50
5/16/05	Kenney	Prepare discovery documents; Draft letters to opposing counsel, Letter to ins. Carrier	4.00
5/23/05	Kenney	Prepare interrogatories, production of documents, Admissions for Plaintiff	5.50
5/24/05	Kenney	Prepare discovery matl's. for Plaintiff and Defendant; Review District's Answer to Complaint, initial Disclosures	4.25
5/31/05	Kenney	Review discovery from Defendants to Plaintiffs; Prepare discovery docs. for Defendant District; Status conf. w/McEwen	3.00
5/31/05	Abraham	Review discovery requests	.25
5/31/05	McEwen	Conference w/Kenney	1.00
6/1/05	Kenney	Prepare discovery documents for District; Withdrawal Letters	2.50
6/8/05	Abraham	Prepare correspondence	.25
7/14/05	McEwen	Conference w/Lewis	.25

7/21/05	McEwen	Prepare letter to Nichols	.75
7/22/05	McEwen	Review discovery request	3.50
8/1/05	McEwen	Phone conf. w/Nichols, Court	.75
8/3/05	Abraham	Review of correspondence	.25
8/9/05	McEwen	Draft answers to interrogatories	2.00
8/11/05	McEwen	Review of file; Draft discovery responses	4.50
8/12/05	McEwen	Draft Discovery	8.00
8/19/05	Abraham	Review of Answers to discovery	.50
8/24/05	McEwen	Draft verification; Meeting w/Association; Review file	4.00
8/29/05	McEwen	Attend depositions	.50
8/30/05	Wagner	Phone conf. w/McEwen	.50
8/30/05	McEwen	Prepare for depositions; Attend depositions	5.00
8/31/05	McEwen	Phone conf's. w/Brace, Kuhar, Nichols; Legal Research	4.00
9/1/05	McEwen	Collect and review docs.; Phone conf. w/Brace; Meeting w/Wagner	2.00
9/6/05	Wagner	Phone conf. w/McEwen; Review files; Attend depositions of Wright, Basran, Prather; Prepare confidentiality agreement	11.00
9/6/05	McEwen	Phone conf. w/Wagner; Review Agreement	2.50
9/7/05	Wagner	Attend deposition; Conf. w/Kuhar	7.00
9/7/05	McEwen	Communicate w/Wagner	.25
9/8/05	Wagner	Prepare deposition notes; Communicate w/McEwen	2.25
9/13/05	McEwen	Phone conf. w/Brace	.50
9/19/05	Abraham	Review of Correspondence	.25

9/19/05	McEwen	Phone conf's. w/Nichols, Hootman	.75
9/26/05	McEwen	Prepare for depositions	1.00
9/27/05	McEwen	Attend depositions	8.00
9/28/05	McEwen	Attend depositions	7.50
9/29/05	McEwen	Attend depositions	5.00
10/13/05	McEwen	Attend depositions; Meeting w/Local Officers	3.50
10/20/05	McEwen	Attend depositions; Phone conf. w/Brace	7.50
10/21/05	Wagner	Phone conf. w/McEwen, re: depositions	.50
10/25/05	Wagner	Attend depositions of McFarren, Pickens, Byrd, Wigton	8.00
10/26/05	McEwen	Review notes; Communicate w/Wagner, Brace	1.00
10/26/05	Wagner	Summarize depositions	2.50
10/27/05	McEwen	Phone conf. w/Wagner	.50
10/27/05	Abraham	Conference w/Wagner, re: depositions	.25
10/30/05	McEwen	Prepare for depositions	3.00
10/31/05	Wagner	Conference w/McEwen; Attend depositions	10.00
10/31/05	McEwen	Prepare for depositions; Attend deposition of Plaintiff; Conference w/Wagner	8.00
11/1/05	Wagner	Prepare notes from Wagner Plaintiff deposition	1.00
11/10/05	McEwen	Communicate w/Kenney; Phone conf. w/Insurance carrier	1.00
11/17/05	McEwen	Phone conf's. w/Kuhar, Nichols; Prepare response	2.75
11/18/05	McEwen	Prepare document response; Phone conf's. w/Kuhar, Nichols; Communicate w/Lewis	4.75
11/21/05	McEwen	Review discovery response	.50

11/22/05	McEwen	Conf. w/Lewis	.50
11/23/05	McEwen	Review discovery response ; Discuss w/Lewis	.75
11/29/05	McEwen	Legal Research; review file; Review Motion to Amend	8.00
11/30/05	Abraham	Phone conf. w/McEwen	.50
11/30/05	McEwen	Review of Court Order; phone conf. w/Kuhar; Review File; Legal research	6.50
12/2/05	McEwen	Legal Research	1.00
12/5/05	McEwen	Legal Research	.75
12/6/05	McEwen	Prepare for phone conf.; Phone conf. w/Kuhar; Phone conf. w/Court	2.00
12/7/05	McEwen	Phone conf. w/General Counsel	.75
12/12/05	McEwen	Legal Research	.75
12/13/05	Abraham	Review of Correspondence	.25
12/13/05	Wagner	Review of Motion for 2 nd Amended Complaint	2.00
12/13/05	McEwen	Phone conf. w/Wagner; Communicate w/Brace	1.00
12/14/05	McEwen	Legal research	4.00
12/14/05	Wagner	Review pleadings, chart comparison; Phone conf. w/McEwen, re: Amended pleading & strategy	5.50
12/15/05	McEwen	Review of response	.50
12/15/05	Wagner	Review pleadings, chart comparison	5.50
12/16/05	Abraham	Conf. w/Wagner, re: Changes in Amended Complaint	.25
12/16/05	Wagner	Legal research, re: employment issues, civil procedure	3.50
12/16/05	McEwen	Revise Brief	8.00
12/19/05	Wagner	Revise Response to Motion for Leave to Amend	3.00
12/19/05	McEwen	Revise Brief; Legal Research	6.50

12/19/05	Wagner	Communicate w/McEwen, re: Response; Legal Research, re: Amendment of Pleadings	1.75
12/20/05	Abraham	Review of Correspondence	.25
12/20/05	Wagner	Legal Research Procedure & substantive issues; Revise Response to Motion for Leave to Amend	6.00
12/20/05	McEwen	Legal Research; Draft brief; Phone conf. w/Kuhar; Discuss w/Brace	6.00
12/21/05	Wagner	Revision of Response to Motion for Leave to Amend	5.50
12/21/05	McEwen	Revise Brief; Communicate w/Wagner	4.50
12/22/05	McEwen	Revise Brief	1.75
12/23/05	Wagner	Phone conf. w/Brace; Revise brief	1.25
1/3/06	McEwen	Review of correspondence from Wagner re: Pleadings; Discuss w/Brace; Review letter; Message for Kuhar	1.50
1/4/06	McEwen	Conference w/Association; Review letter from Nichols; Communicate w/Debbie	1.50
1/9/06	Abraham	Phone conf. w/McEwen, re: Settlement	.50
1/9/06	McEwen	Phone conf. w/Judge; Review faxes; Legal research	3.25
1/10/06	Wagner	Phone conf. w/McEwen; Review Nichols' brief re: Motion to amend	1.50
1/10/06	McEwen	Revise letter to judge; Hearing preparation	6.50
1/12/06	Wagner	Attend USDC Hearing	7.00
1/12/06	McEwen	Prepare for and Attend USDC Hearing	6.75
1/13/06	McEwen	Communicate w/Staff attorneys	.25
1/17/06	McEwen	Communicate w/Staff attorneys	.25
1/18/06	Abraham	Review and revise brief	<u>.25</u>
Total Hours			437.6

Summary of Attorney Hours

<u>Attorney</u>	<u>School Year</u>	<u>Hours</u>	<u>Rate</u>	<u>Total Billing</u>
Mark Widoff	2004-2005	1.6	\$183.64	\$ 293.82
Robert J. Abraham	2004-2005	8	144.58	1,156.64
	2005-2006	3.25	148.92	483.99
Richard S. McEwen	2004-2005	1	101.39	101.39
	2005-2006	166.5	104.43	17,387.60
John Paul Jones	2004-2005	30.5	133.90	4,083.95
Owen Kenney	2004-2005	141.5	49.44	6,995.76
Shannon M. Wagner	2005-2006	85.25	48.61	<u>4,144.00</u>
Total Attorney Fees:				\$34,647.15

